

# **EXHIBIT A**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA  
ASHEVILLE DIVISION  
CASE NUMBER 1:20CV66**

CARYN DEVINS STRICKLAND, )  
 )  
Plaintiff, )  
 )  
v. )  
 )  
UNITED STATES OF AMERICA, et al., )  
 )  
Defendants. )

**DEFENDANTS' INITIAL DISCLOSURES**

Pursuant to Fed. R. Civ. P. 26(a)(1), Defendants provide these initial disclosures to Plaintiff. These disclosures are based on Defendants' present understanding of Plaintiff's allegations and claims as set forth in Plaintiff's Complaint and reflect the information reasonably available to Defendants at this time. Defendants reserve the right to supplement or amend these disclosures, including pursuant to Fed. R. Civ. P. 26(e), as developments may warrant.

**1. The Name and, If Known, the Address and Telephone Number of Each Individual Likely to Have Discoverable Information—Along with the Subjects of That Information—That the Disclosing Party May Use to Support Its Claims or Defenses, Unless the Use Would Be Solely for Impeachment**

Name and Contact Information	Subjects of Discoverable Information
Peter Adolf  129 West Trade St. Suite 300 Charlotte, NC 28202 (704) 374-0720  (Contact through Defendants' counsel)	Knowledge of events alleged in complaint
Heather Beam	Knowledge of events alleged in complaint

401 West Trade St Charlotte NC 28202 704-350-7601  (Contact through Defendants' counsel)	
Joshua Carpenter  129 West Trade St. Suite 300 Charlotte, NC 28202 (704) 374-0720  (Contact through Defendants' counsel)	Knowledge of events alleged in complaint
Cait Clarke  1 Columbus Cir., NE Washington, D.C. 20544 202-502-3060  (Contact through Defendants' counsel)	Knowledge of events alleged in complaint
John Parke Davis  129 West Trade St. Suite 300 Charlotte, NC 28202 (704) 374-0720  (Contact through Defendants' counsel)	Knowledge of events alleged in complaint
James Ishida  Lewis F. Powell, Jr. United States Courthouse Annex 1000 East Main Street, Richmond, Virginia 23219-3517 (804) 916-2700  (Contact through Defendants' counsel)	Knowledge of events alleged in complaint
Jill Langley  1 Columbus Cir., NE	Knowledge of events alleged in complaint

Washington, D.C. 20544 (303) 335-2975  (Contact through Defendants' counsel)	
Anthony Martinez  Contact through: Missy Spainhour Constangy, Brooks, Smith & Prophete LLP 84 Peachtree Road Suite 230 Asheville, NC 28803 (828) 333-4218	Knowledge of events alleged in complaint
William Moormann  129 West Trade St. Suite 300 Charlotte, NC 28202 (704) 374-0720  (Contact through Defendants' counsel)	Knowledge of events alleged in complaint

**2. A Copy—or a Description by Category and Location—of All Documents, Electronically Stored Information, and Tangible Things That the Disclosing Party Has in Its Possession, Custody, or Control and May Use to Support Its Claims or Defenses, Unless the Use Would Be Solely for Impeachment.**

Unless stated otherwise below, the categories of documents listed below are already in Plaintiff's possession and/or the possession of the Office of the Federal Public Defender for the Western District of North Carolina (129 West Trade St., Suite 300, Charlotte, NC 28202), the Administrative Office of the U.S. Courts (1 Columbus Cir., NE, Washington, D.C. 20544), and/or the United States Court of Appeals for the Fourth Circuit (1100 E Main St #501, Richmond, VA 23219). For purposes of these disclosures, the term "documents" includes electronically stored information.

1. Documents referenced in the Complaint.
2. Documents referenced in the Answer.
3. Documents referenced in, and/or submitted with, the parties' summary judgment briefing.
4. Documents concerning Plaintiff's participation in the Fourth Circuit's Employee Dispute Resolution process.
5. Any documents produced or provided by Plaintiff.

Dated: August 19, 2022

Respectfully submitted,

BRIAN D. BOYNTON  
Principal Deputy Assistant Attorney General

CARLOTTA P. WELLS  
Assistant Branch Director

/s/ Joshua Kolsky

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*Counsel for Defendants*

### **CERTIFICATE OF SERVICE**

I certify that, on August 19, 2022, I served a copy of the foregoing by email on counsel for Plaintiff.

/s/ Joshua Kolsky